

1 William D. Hyslop
2 United States Attorney
3 Eastern District of Washington
4 Earl A. Hicks
5 Assistant United States Attorney
6 Post Office Box 1494
7 Spokane, WA 99210-1494
8 Telephone: (509) 353-2767

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

DEC 18 2019

SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

9 UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 WILLIAM RAY CLONINGER, JR.,

15 Defendant.

2:19-CR-216-WFN

INDICTMENT

Vio: 18 U.S.C. § 472

Possession of Counterfeit

Currency (Count 1)

18 U.S.C. § 472

Passing Counterfeit Currency

(Counts 2-7)

18 U.S.C. § 471

Manufacture of Counterfeit

Currency (Count 8)

18 U.S.C. §§ 982(a)(2)(B), 492,

28 U.S.C. § 2461(c)

Notice of Criminal Forfeiture

24 The Grand Jury charges:

25
26 **COUNT 1**

27 On or about October 16, 2019, in the Eastern District of Washington, the
28 Defendant, WILLIAM RAY CLONINGER, JR., did, with the intent to defraud,

INDICTMENT - 1

1 possess falsely made, forged, and counterfeit Federal Reserve Notes, to wit: seven
2 (7) \$20 Federal Reserve Notes, bearing serial number MG43818307D, which
3
4 WILLIAM RAY CLONINGER, JR. knew to be falsely made, forged, and
5 counterfeit, all in violation of 18 U.S.C. § 472.
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7 COUNT 2

8 On or about June 25, 2019, in the Eastern District of Washington, the
9 Defendant, WILLIAM RAY CLONINGER, JR., did, with the intent to defraud,
10 pass six (6) falsely made, forged, and counterfeit \$20 Federal Reserve Notes,
11 bearing serial number, MB8419016IE and one (1) falsely made, forged, and
12 counterfeit \$20 Federal Reserve Notes, bearing serial number, JF9431019B, which
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14 WILLIAM RAY CLONINGER, JR. knew to be falsely made, forged, and
15 counterfeit, to Home Depot Store No. 4714, located at 5617 E. Sprague Avenue,
16
17 Spokane Valley, Washington, 99025, all in violation of 18 U.S.C. § 472.
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19 COUNT 3

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21 On or about August 2, 2019, in the Eastern District of Washington, the
22 Defendant, WILLIAM RAY CLONINGER, JR., did, with the intent to defraud,
23 pass two (2) falsely made, forged, and counterfeit \$20 Federal Reserve Notes,
24 bearing serial number MK10703609E, and three (3) falsely made, forged, and
25 counterfeit \$20 Federal Reserve Notes, bearing serial number MF44997829F,
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27 which WILLIAM RAY CLONINGER, JR. knew to be falsely made, forged, and
28

1 counterfeit, to Home Depot Store No. 4714, located at 5617 E. Sprague Avenue,
2 Spokane Valley, Washington, 99025, all in violation of 18 U.S.C. § 472.
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4 COUNT 4

5 On or about August 3, 2019, in the Eastern District of Washington, the
6 Defendant, WILLIAM RAY CLONINGER, JR., did, with the intent to defraud,
7 pass two (2) falsely made, forged, and counterfeit \$20 Federal Reserve Notes,
8 bearing serial number MD17281740D, which WILLIAM RAY CLONINGER, JR.
9 knew to be falsely made, forged, and counterfeit, to M.R., Spokane, Washington,
10 all in violation of 18 U.S.C. § 472.
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14 COUNT 5

15 On or about September 17, 2019, in the Eastern District of Washington, the
16 Defendant, WILLIAM RAY CLONINGER, JR., did, with the intent to defraud,
17 pass three (3) falsely made, forged, and counterfeit \$20 Federal Reserve Notes,
18 bearing serial number MF09154877K, which WILLIAM RAY CLONINGER, JR.
19 knew to be falsely made, forged, and counterfeit, to Cricket Wireless, located at
20 13817 E. Sprague Avenue #10, Spokane Valley, Washington, 99216, all in
21 violation of 18 U.S.C. § 472.
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25 COUNT 6

26 On or about September 24, 2019, in the Eastern District of Washington, the
27 Defendant, WILLIAM RAY CLONINGER, JR., did, with the intent to defraud,
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1 pass one (1) falsely made, forged, and counterfeit \$20 Federal Reserve Note,
2 bearing serial number ML39276413L and four (4) falsely made, forged, and
3 counterfeit \$20 Federal Reserve Notes, bearing serial number MD31653485E
4 which WILLIAM RAY CLONINGER, JR. knew to be falsely made, forged, and
5 counterfeit, to K.T. in Spokane County, Washington, 99216, all in violation of
6
7 18 U.S.C. § 472.
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10 COUNT 7

11 On or about October 15, 2019, in the Eastern District of Washington, the
12 Defendant, WILLIAM RAY CLONINGER, JR., did, with the intent to defraud,
13 pass three (3) falsely made, forged, and counterfeit \$20 Federal Reserve Notes,
14 bearing serial number MG94337856F, which WILLIAM RAY CLONINGER, JR.
15 knew to be falsely made, forged, and counterfeit, to Home Depot located at 9116
16 N. Newport Hwy., Spokane, Washington, all in violation of 18 U.S.C. § 472.
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20 COUNT 8

21 On or about and between May 15, 2019, and on or about October 16, 2019,
22 in the Eastern District of Washington, the Defendant, WILLIAM RAY
23 CLONINGER, JR. with the intent to defraud, falsely made, forged, and
24 counterfeited \$20 Federal Reserve Notes, bearing various serial numbers, all in
25 violation of 18 U.S.C. § 471.
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NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The violations charged in this Indictment are hereby re-alleged and incorporated herein by reference for the purpose of alleging forfeitures.

Pursuant to 18 U.S.C. § 982(a)(2)(B) upon conviction of an offense(s) in violation of 18 U.S.C. §§ 471 and 472, as charged in this Indictment, the Defendant, WILLIAM RAY CLONINGER, JR., shall forfeit to the United States of America, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation.

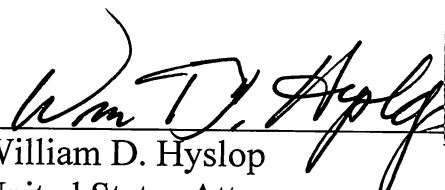
Pursuant to 18 U.S.C. § 492 and 28 U.S.C. § 2461(c), upon conviction of an offense(s) in violation of 18 U.S.C. §§ 471 and 472, as charged in this Indictment, the Defendant, WILLIAM RAY CLONINGER, JR., shall forfeit to the United States of America, all counterfeits of any coins or obligations or other securities of the United States or of any foreign government; any articles, devices, and other things made, possessed, or used in violation of 18 U.S.C. §§ 471, 472; and, any material or apparatus used or fitted, or intended to be used, in the making of such counterfeits, articles, devices, or things, found in the possession of the Defendants without proper authority.

If any forfeitable property, as a result of any act or omission of the Defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property, which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) or 28 U.S.C. § 2461(c).

DATED this 17 day of December, 2019.


William D. Hyslop
United States Attorney


Earl A. Hicks
Assistant United States Attorney